

4.0 PROJECT ALTERNATIVES

An Environmental Impact Report (EIR) must describe and evaluate a “range of reasonable alternatives to the project, or to the location of the project which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project....” [State California Environmental Quality Act (CEQA) Guidelines Section 15126.6(a)]. As noted in Chapter 1.0, the project objectives are as follows:

1. Meet the requirements of the USFS grant for the removal of DDD trees within the Greater Julian Area, based on the priority areas recommended by the FAST program.
2. Help to prevent DDD trees from impeding the evacuation of people and domestic animals or hindering fire access by firefighters.
3. Create defensible space along evacuation and fire access routes for firefighters.

The potentially significant effects of the proposed project are:

- Temporary indirect noise impacts to nesting special-status birds from project equipment.
- Direct impact to previously unknown human remains.
- Temporary direct noise impacts at wood debris staging site(s) in excess of noise ordinance standards.
- Substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

The following sections discuss whether the alternatives meet the objectives and whether they would substantially reduce the significant effects of the proposed project.

4.1 Rationale for Alternative Selection

Alternatives were selected to comply with the requirements of CEQA, which requires an analysis of alternatives that would avoid or substantially lessen any significant project effects. As discussed in further detail in Chapters 2.0 and 3.0 of this DEIR, none of the project’s direct or cumulative impacts would remain unavoidable and all impacts would be reduced to below significance with incorporation of mitigation measures and project design features.

CEQA Guidelines Section 15126.6(e)(1) requires that a No Project Alternative be analyzed. The No Project Alternative assesses potential environmental impacts that could result if the project were not approved. As such, without the project, the County would not remove DDD trees from privately owned parcels in the Greater Julian Area.

Seven alternatives, in addition to the No Project Alternative, were considered, as discussed below. The alternatives are:

- Reduced Treatment Area Width Alternative;
- Removing DDD Trees within 500 feet of Roadways Only Alternative;
- Removing DDD Trees Only from Strategic Locations for Firefighting Activities Alternative;

- Removing DDD Trees from around Structures Only and Fire Hardening Structures Alternative;
- Introduce a Predator of the Gold-spotted Oak Borer Alternative;
- Seasonal Breeding Restriction Alternative; and
- Different Location Alternative.

4.2 Alternatives Considered But Rejected From Further Study

The following five alternatives were considered but rejected from further study either because they did not meet the project objectives or they were determined to be infeasible.

Removing DDD Trees Only from Strategic Locations for Firefighting Activities Alternative

This alternative was rejected from further study because the strategic locations for fighting fires cannot be determined until a fire has begun. A fire's behavior is much dependent on the current weather conditions that cannot be anticipated until a fire is ignited. Though models can be run based on certain fire aspects and weather conditions, if a fire will actually occur, and when and where it will occur, cannot be determined. Focusing all the DDD tree removal on just areas that might be but cannot be known to be strategic locations leaves the rest of the Greater Julian Area at risk. This alternative would not meet Objectives 1 or 2 because DDD trees that could fall or roll onto structures or evacuation routes would likely not be removed. Objective 3 would also not be met because the strategic locations that might be selected for DDD tree removal may not actually be the strategic locations for a particular fire. This alternative was rejected because it would not meet any of the project objectives.

Removing DDD Trees around Structures Only and Retrofitting Structures to Be More Fire Resistant Alternative

This alternative would remove selected DDD trees from within 500 feet of structures and would provide funding to private parcel owners to retrofit their structures to be more resistant to ignition. This alternative was rejected because it does not meet any of the objectives [or achieve the project benefits](#). Regarding Objective 1, the USFS grant is only for removing DDD trees and cannot be used to retrofit structures. Objectives 2 and 3 would not be met because DDD trees would not be removed along the highways or along access roads, and therefore, could still fall on the highways or access roads and impede the evacuation during fires, and may hinder fire access by firefighters.

Introduce a Predator of the Gold-spotted Oak Borer Alternative;

Approximately 90 percent of the DDD trees that would be removed are oaks and many of them have been killed or weakened by infestation by the gold-spotted oak borer. New studies were initiated on the GSOB in the spring of 2010 by the Center of Invasive Species Research at U.C. Riverside, one of which is to gain information about the GSOB's natural enemies with the ultimate goal of developing a classical biological control program for this invasive pest, where a pest's co-evolved natural enemies are found and collected from the pest's native range, and eventually released into the invaded area (i.e., the Greater Julian Area) after the proper safety tests are completed. These

safety tests ensure that the natural enemies will only attack the targeted pest and will not harm native or beneficial insects. This alternative was rejected because, though the alternative may keep more oak trees from dying, it would not remove any DDD trees; therefore, none of the objectives of the project would be met. In addition, the studies have not been completed, making this alternative infeasible in the time limit dictated by the USFS grant.

Seasonal Breeding Restriction Alternative

Under this alternative, DDD tree removals would not occur during the breeding season of birds, generally considered to be between January 15 and July 15. With the urgency to get the proposed project under way in order to accomplish public safety objectives, additional contracts would need to be issued by the County in order to complete DDD tree removals by the time the grant expires (March 2013). The increase in overlapping operating contractors would increase short-term project-related noise and air quality effects above levels analyzed for the proposed project. Furthermore, the intended biological resource benefit of this alternative is nullified by the fact that the proposed project would avoid all active nests. As such, this alternative would not lessen any of the environmental effects associated with the proposed project. Therefore, a seasonal breeding restriction alternative is rejected from further consideration.

Different Location Alternative

State CEQA Guidelines Section 15126.6(f)(2) require that the Lead Agency consider an alternative location for a proposed project and that if there are no feasible alternative locations, reasons for this conclusion must be disclosed in the EIR. The project, which is a tree removal project for the Greater Julian Area, is an optional and voluntary program in which private landowners can choose to participate. As such, the physical locations of each of the project-related activities could not fully be known at the time this EIR was prepared. However, the project would occur within a defined project area along the SR 78/ SR 79 corridor where natural conditions and fire have resulted in DDD trees. In this regard, the scope of the proposed project is rather narrow and the resulting locations where it can occur are limited. The adoption of an alternative location for the proposed project would not meet the FAST recommendations. The Greater Julian Area is FAST's highest priority for treatment, since the Palomar Mountain area has already been completed. Additionally, as the SR 78/SR 79 corridor is the primary access and evacuation route in the Greater Julian Area, there are no feasible alternative locations to the proposed project. Therefore, a different location alternative is rejected from further consideration.

4.3 Analysis of the No Project Alternative

4.3.1 No Project Alternative Description and Setting

Under the No Project Alternative, the removal of an estimated 20,000 DDD trees would not occur and the existing conditions described for each issue area in Chapters 2.0 and 3.0 would generally remain the same; however, some private property owners may choose to have DDD trees removed on their own. This is not anticipated to result in the same magnitude of effects as the proposed project because not as many property owners would choose to pay for the cost associated with tree removals or do it themselves as would choose to participate in a free program to remove DDD trees.

Under an emergency wildfire scenario, the No Project Alternative would result in a greater potential for increased public safety risks as a result of the lack of defensible space along evacuation and fire access routes in the Greater Julian Area, and as a result of roadway blockages created by downed trees that fall, roll, slide, or otherwise travel onto roads. Additionally, damage to wildlife and habitats on privately owned lands currently signed up for the tree removal program may be greater as a result of wildfires under the No Project Alternative.

Finally, removing dead or dying trees infested with GSOB, followed by careful handling of infested materials, may reduce localized populations of the insects (UC Riverside 2011). With the No Project Alternative, fewer DDD trees would be removed since the property owners would have to pay for their removal or do it themselves; therefore, the spread of GSOB may be enhanced under the No Project Alternative in relation to the proposed project.

A comparative discussion of each issue area under the No Project Alternative is provided below.

4.3.2 Comparison of the Effects of the No Project Alternative to the Proposed Project

Air Quality

Under the No Project Alternative, new short-term emissions generated within the project area of ROG, NOX, CO, SOX, PM₁₀, and PM_{2.5} may result from private land owners removing DDD trees on their own; however, this would be expected to occur on a much smaller scale than the proposed project because the private property owners whose trees are identified would not simultaneously cut and remove their DDD trees within the project timeline the County has set for removing the estimated 20,000 DDD trees. As such, air emissions would be less than those projected for the project. Similar to the proposed project, air quality impacts would be less than significant.

Biological Resources

Under the No Project Alternative, biological resources surveys and monitoring efforts, including the establishment of sensitive areas to be avoided, would not occur. Should individual property owners independently decide to remove DDD trees on their land, potential direct and indirect (*i.e.*, noise) impacts to sensitive habitats or nesting special-status species could occur. The proposed project would result in potentially significant impacts requiring mitigation. Given the limited extent of DDD tree removals that would likely occur, direct and indirect effects to special-status species would likely be quite limited; therefore, biological resources impacts under the No Project Alternative would be less than significant.

Damage to wildlife and habitats on privately owned lands currently signed up for the DDD tree removal program may be greater as a result of wildfires under the No Project Alternative. It is not possible to predict the specific effects of future wildfires, and lands adjacent to participating parcels would retain their current fuel load with or without the proposed project; therefore, effects to biological resources under the No Project Alternative would likely be similar to effects under the proposed project.

Cultural Resources

Under the No Project Alternative, cultural resources surveys and monitoring efforts, including the establishment of sensitive areas to be avoided, would not occur. Should individual property owners independently decide to treat DDD trees on their land, impacts to potentially significant cultural resources could occur. Through the design of the proposed project, potentially significant impacts to cultural resources would be avoided. Cultural resources impacts under the No Project Alternative would be potentially significant.

Hazards and Hazardous Materials

The potential for DDD tree removals by landowners without professional help would have an inherent increased risk for injury and/or death associated with untrained persons felling trees. Additionally, all DDD trees would fall eventually, generally without warning and at some risk to nearby persons, animals or structures or to blocking access and evacuation roads, which could lead to additional loss of life if people are not able to evacuate from the Greater Julian Area during a catastrophe, such as wildfire or earthquake. As such, potential public safety hazards would be potentially significant under the No Project Alternative, where such impacts under the proposed project would be less than significant due to the employment of trained tree removal contractors and the removal of DDD trees.

With respect to hazardous materials, the No Project Alternative would be similar to the proposed project and impacts are not anticipated. As described in the Initial Study (Appendix A), no hazardous wastes were identified. Therefore, implementation of the No Project Alternative would not generate any impact related to hazardous materials. Also, the project site is not within the vicinity of a private or public airstrip.

Hydrology and Water Quality

Similar to the proposed project, the No Project Alternative would not involve waste discharges requiring permits or water quality certification from the SDRWQCB and impacts would not occur under either scenario. The No Project Alternative would not involve any additional water quality or hydrology impacts related to impaired water bodies or applicable surface or groundwater objectives, similar to the proposed project. Also, the No Project Alternative would not deplete groundwater supplies, alter existing drainage patterns, or create runoff, similar to the project. Lastly, this alternative would not place housing or structures within a 100-year flood hazard area, similar to the proposed project.

Noise

Under the No Project Alternative, minor amounts of noise would occur if individual property owners independently decide to treat DDD trees on their land. The level of noise generated would be less than that generated by the equipment projections for DDD tree removal crews under the proposed project. The DDD tree removal activities on private parcels associated with the proposed project would be exempt under the County's noise ordinance and therefore, related noise impacts would be less than significant. No wood debris staging sites would be used under the No Project Alternative. Tree removal noise associated with the No Project Alternative would be similar to the

proposed tree removal activities and would also be exempt per the noise ordinance, resulting in a less-than-significant impact.

Ability to Meet Project Objectives

Under the No Project Alternative, the County would not remove the DDD trees from private properties in the Greater Julian Area. The existing DDD trees would predominantly remain in their current condition within the project area until each of them falls or is cut down by a private property owner.

This alternative would generally meet Objective 6 because by not implementing a project to remove the DDD trees, the risk of damage to wildlife and habitats on private lands associated with the proposed project implementation would not exist. Otherwise, the No Project Alternative would not meet the project Objectives. The No Project Alternative would not meet Objectives 1 and 2 because the treatment area recommendations of the FAST for the Greater Julian Area would not be met and there would be no assurance that DDD trees would not fall, roll slide, or travel onto roads during a fire or other catastrophic event. Objectives 3 through 5, which would reduce the risk of injury or death to humans and domestic animals and destruction or damage to structures, create defensible space along evacuation and fire access routes for firefighters, and improve forest health by removing fuels, also would not be met under the No Project Alternative. DDD trees may be removed by landowners at their convenience with or without professional help even though there is a significant risk of injury and/or death when untrained persons fell trees. All DDD trees will fall eventually, generally without warning and at some risk to nearby persons or animals. Lastly, the No Project Alternative would not provide for accomplishing Objective 7, which aims to reduce the infestation and spread of the gold-spotted oak borer.

4.4 Analysis of the Reduced Treatment Area Width Alternative

4.4.1 Reduced Treatment Area Width Alternative Description and Setting

The Reduced Treatment Area Width Alternative would strategically remove selected DDD trees on privately owned parcels within a 100- to 400-foot maximum treatment width¹ along each side of State Route (SR) 78 and SR 79 in the Greater Julian Area, and around existing structures and infrastructure facilities located along evacuation routes (adjoining roads that provide access to at least three homes or facilities) from structures.

4.4.2 Comparison of the Effects of the Reduced Treatment Width Alternative to the Proposed Project

Air Quality

The Reduced Treatment Area Width Alternative would generate short term emissions of ROG, NO_x, CO, SO_x, PM₁₀, PM_{2.5}, and GHGs. These emissions would be emitted during a maximum 270-day tree removal period and would not exceed the CEQA or County significance guidelines. The

¹ In practice, the treatment area width would vary depending on an assessment of field conditions including site topography (steepness) and accessibility of DDD trees to be removed, any identified safety considerations, and the presence of sensitive biological or cultural resources.

proposed project would not affect vehicle travel within the project area or result in long-term operational emissions and this alternative also would not. The proposed project's contribution to cumulative emissions is not substantial and the contribution by the Reduced Treatment Area Width Alternative would not exceed that of the proposed project and, therefore, is also not substantial. As with the proposed project, air quality impacts would be less than significant.

Biological Resources

The Reduced Treatment Area Width Alternative would include the same avoidance measures and design considerations to avoid impacts to sensitive biological resources as have been identified for the proposed project. These measures include eliminating areas with sensitive species or sensitive habitats from the treatment area in consultation with the USFWS and CDFG, and surveying for the presence of active nests and holes where other animals may lodge and not removing those trees. If DDD tree removal occurs during the breeding season, this alternative and the proposed project would have potentially significant temporary indirect impacts to nesting special-status birds from project equipment noise. No other significant impacts would occur to biological resources. The Reduced Treatment Area Width Alternative may somewhat lessen the potential for this significant temporary indirect impact to nesting special-status birds because the DDD tree removals would be closer to structures and roads where birds are less likely to nest; however, the difference in the impact between this alternative and the proposed project is not substantially in regards to biological resources. The impacts and mitigation for this alternative are the same as for the proposed project.

Cultural Resources

The Reduced Treatment Area Width Alternative would include the same avoidance measures and design considerations to avoid impacts to cultural resources as have been identified for the proposed project. The only potentially significant impact of the proposed project is that of finding previously unknown human remains. Such discovery is unlikely since removal of DDD trees does not involve moving earth. Reducing the treatment area width would not substantially lessen this potential impact. The impacts and mitigation for the Reduced Treatment Area Width Alternative are the same as for the proposed project.

Hazards and Hazardous Materials

Since all dead trees would fall eventually, the removal of DDD trees within a reduced maximum treatment area width instead of the 500-foot width of the proposed project would increase the risk of DDD trees falling without warning and at some risk to nearby persons, animals or structures, and could allow DDD trees to block access and evacuation roads. DDD trees within 200 feet of structures and roads on participating private parcels in the Greater Julian Area have already been removed. The objective of the USFS grant is to remove the DDD trees from up to 500-feet from structures, access roads and evacuation routes and the reasons for the 500-foot width are described in detail in Chapter 1. Allowing DDD trees to remain could lead to additional loss of life if people are not able to evacuate from the Greater Julian Area during a wildfire or other catastrophe. As such, potential public safety hazards would be potentially significant under the Reduced Treatment Area Width Alternative, where such impacts under the proposed project would be less

than significant. Using reduced treatment area width could cause substantially worse safety hazards than the proposed project.

With respect to hazardous materials, the this alternative would be similar to the proposed project and impacts are not anticipated. No hazardous wastes would be created or used with this alternative or the proposed project and this alternative would not generate any impact related to hazardous materials. Also, the project site is not within the vicinity of a private or public airstrip.

Hydrology and Water Quality

As with the proposed project, the Reduced Treatment Area Width Alternative would not involve waste discharges requiring permits or water quality certification from the SDRWQCB and impacts would not occur under either scenario. This alternative would not result in water quality or hydrology impacts related to impaired water bodies or applicable surface or groundwater objectives, similar to the proposed project. This alternative would not deplete groundwater supplies, alter existing drainage patterns, or create runoff, similar to the project. Neither the proposed project nor this alternative would place housing or structures within a 100-year flood hazard area. Impacts to hydrology and water quality under this and the proposed project are less than significant.

Noise

Under the Reduced Treatment Area Width Alternative, the same kind of equipment would be used and the same noise levels would be produced. As with the proposed project, the noise generated by this alternative would be temporary. Therefore, the noise impacts of this alternative would be the same as for the proposed project and would be the (1) temporary direct noise impacts at wood debris staging site(s) in excess of noise ordinance standards, and (2) substantial temporary or periodic increase in ambient noise levels in the wood debris staging site(s) vicinity above levels existing without the project. The impacts at the wood debris staging site(s) would be the same with this alternative or the proposed project and would require the same mitigation measures.

Ability to Meet Project Objectives

As described in Chapter 1.0 (Section 1.2.1.3 – *Rationale for 500 foot Treatment Area Width*), trees that fall, or burn and fall, on steep slopes may roll, slide or fall a long way. DDD trees can easily fall and roll for long distances on steep terrain and land on roads and structures below. Steep lands also have a strong effect on fires that burn upward from below roads and structures. Fire fighters indicate that a safe zone is one that needs to be more than twice the flame length generated by a fire through a particular vegetation community. Forested areas during the fires in 2003 and 2007 generated flame lengths that were up to and exceeded 200-250 feet. Therefore, the proposed 500-foot maximum treatment width would reasonably be the minimum distance necessary, particularly in areas that are up slope from steep terrain that contains DDD trees. Most importantly, implementation of a reduced treatment area width alternative would not substantially lessen any of the potentially significant impacts of the proposed project. Mitigation measures for the reduction of noise impacts to adjacent residents and special-status birds and for the protection of biological and cultural resources would be necessary regardless of the treatment area width.

The Reduced Treatment Width Alternative is feasible but it would not meet any of the three project objectives. DDD trees were removed from within 200 feet of SR 78, SR 79, and evacuation roads, and within 200 feet of habitable structures on participating private parcels in the greater Julian area beginning in 2004. This work was funded by a grant from the Resource Conservation District and the USFS. For maximum protection against wildfires, those parcels would be treated for an additional 300 feet under the proposed project, which could not happen with the Reduced Treatment Width Alternative. Any trees that have died since then would be removed within 200 feet of habitat structures on participating structures.

For Objective 1, the USFS grant is to remove DDD trees from within 500 feet of structures and evacuation roads, which would not be met by this alternative. Objective 2 is to help to prevent DDD trees from impeding the evacuation of people and domestic animals or hindering fire access by firefighters; using a treatment width of less than 500 feet would not meet this objective for the reasons given above. Objective 3 is to create defensible space along evacuation and fire access routes for firefighters. As discussed above a safe zone of at least 500 feet is necessary in areas of steep slopes, and would not be met by a reduced treatment area width.

4.5 Analysis of the Removing DDD Trees within 500 feet of Roadways Only Alternative

4.5.1 Removing DDD Trees within 500 feet of Roadways Only Alternative Description and Setting

The Removing DDD Trees within 500 feet of Roadways Only Alternative would strategically remove selected DDD trees from participating privately owned parcels within 500 feet along each side of State Route (SR) 78 and SR 79 in the Greater Julian Area, and around along evacuation routes (adjoining roads that provide access to at least three homes or facilities). All other aspects of the project would remain the same.

4.5.2 Comparison of the Effects of the Removing DDD Trees within 500 feet of Roadways Only Alternative to the Proposed Project

Air Quality

The Removing DDD Trees within 500 feet of Roadways Only Alternative would generate short term emissions of ROG, NO_x, CO, SO_x, PM₁₀, PM_{2.5}, and GHGs, as would the proposed project. These emissions would be emitted during a maximum 270-day tree removal period and would not exceed the CEQA or County significance guidelines. The proposed project would not affect vehicle travel within the project area or result in long-term operational emissions and this alternative also would not. The proposed project's contribution to cumulative emissions is not substantial and the contribution by the Removing DDD Trees within 500 feet of Roadways Only Alternative would not exceed that of the proposed project and, therefore, is also not substantial. As with the proposed project, air quality impacts would be less than significant.

Biological Resources

The Removing DDD Trees within 500 feet of Roadways Only Alternative would include the same avoidance measures and design considerations to avoid impacts to sensitive biological resources as

have been identified for the proposed project. These measures include eliminating areas with sensitive species or sensitive habitats from the treatment area in consultation with the USFWS and CDFG, and surveying for the presence of active nests and holes where other animals may lodge and not removing those trees. If DDD tree removal occurs during the breeding season, this alternative and the proposed project would have potentially significant temporary indirect impacts to nesting special-status birds from project equipment noise. No other significant impacts would occur to biological resources. The difference in the impact between this alternative and the proposed project is not substantial in regards to biological resources. The impacts and mitigation for this alternative are the same as for the proposed project.

Cultural Resources

The Removing DDD Trees within 500 feet of Roadways Only Alternative would include the same avoidance measures and design considerations to avoid impacts to cultural resources as have been identified for the proposed project. The only potentially significant impact of the proposed project is that of finding previously unknown human remains. Such discovery is unlikely since removal of DDD trees does not involve moving earth. There is no evidence to suggest that human remains would be more likely to be found within 500 feet of structures than within 500 feet of roads. Therefore, removing DDD trees from participating private parcels along roadways only would not substantially lessen this potential impact. The impacts and mitigation for the Removing DDD Trees within 500 feet of Roadways Only Alternative are the same as for the proposed project.

Hazards and Hazardous Materials

Since all dead trees would fall eventually, removing DDD Trees within 500 feet of roadways only would increase the risk of DDD trees falling without warning and at some risk to nearby persons, animals or structures. DDD trees within 200 feet of structures and roads on participating private parcels in the Greater Julian Area have already been removed. The objective of the USFS grant is to remove the DDD trees from up to 500-feet from structures, access roads and evacuation routes. Allowing DDD trees to remain within 500 feet of structures could lead to additional loss of life and damage to property. As such, potential public safety hazards could be potentially significant under the Removing DDD Trees within 500 feet of Roadways Only Alternative, where such impacts under the proposed project would be less than significant. Removing DDD trees from along roadways only could cause substantially worse hazards than the proposed project.

With respect to hazardous materials, this alternative would be similar to the proposed project and impacts are not anticipated. No hazardous wastes would be created or no hazardous materials would be used with this alternative or the proposed project and this alternative would not generate any impact related to hazardous materials. Also, the project site is not within the vicinity of a private or public airstrip.

Hydrology and Water Quality

As with the proposed project, the Removing DDD Trees within 500 feet of Roadways Only Alternative would not involve waste discharges requiring permits or water quality certification from the SDRWQCB and impacts would not occur under either scenario. This alternative would not

result in water quality or hydrology impacts related to impaired water bodies or applicable surface or groundwater objectives, similar to the proposed project. This alternative would not deplete groundwater supplies, alter existing drainage patterns, or create runoff, similar to the project. Neither the proposed project nor this alternative would place housing or structures within a 100-year flood hazard area. Impacts to hydrology and water quality under this and the proposed project are less than significant.

Noise

Under the Removing DDD Trees within 500 feet of Roadways Only Alternative, the same kind of equipment would be used and the same noise levels would be produced as with the proposed project. As with the proposed project, the noise generated at the wood debris staging site(s) by this alternative would be temporary. Therefore, the noise impacts of this alternative would be the same as for the proposed project and would be the (1) temporary direct noise impacts at wood debris staging site(s) in excess of noise ordinance standards, and (2) substantial temporary or periodic increase in ambient noise levels in the wood debris staging site(s) vicinity above levels existing without the project. The impacts at the wood debris staging site(s) would be the same with this alternative or the proposed project and would require the same mitigation measures.

Ability to Meet Project Objectives

Implementation of the Removing DDD Trees within 500 feet of Roadways Only Alternative would not substantially lessen any of the potentially significant impacts of the proposed project. Mitigation measures for the reduction of noise impacts to adjacent residents and special-status birds and for the protection of biological and cultural resources would be necessary during removal of DDD trees on privately owned parcels within 500 feet of evacuation roads, just as they are necessary for removing DDD trees from along roads and around structures.

The Removing DDD Trees within 500 feet of Roadways Only Alternative is feasible but it would not meet any of the three project objectives. For Objective 1, the USFS grant is to remove DDD trees from within 500 feet of structures and evacuation roads, which would not be met by this alternative. Objective 2 of helping to prevent DDD trees from impeding the evacuation of people and domestic animals or hindering fire access by firefighters would somewhat be met by this alternative, but would not assist firefighters when they are trying to fight fires that are threatening structures. Objective 3 to create defensible space along evacuation and fire access routes for firefighters would be met by this alternative.

4.6 Environmentally Superior Alternative

Of the No Project Alternative and the three alternatives that were analyzed, none would substantially lessen the significant impacts of the proposed project. The Reduced Treatment Area Width Alternative, which is more similar to the proposed project than the other alternatives, is environmentally superior to the others. It would provide the maximum amount of safety for the public and firefighters, and significant impacts would be the virtually the same as the proposed project, all of which can be mitigated to a level that is less than significant.